

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

MARIA GUZMAN MORALES and
MAURICIO GUARJARDO, on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

FARMLAND FOODS, INC., a Delaware
Corporation and subsidiary of Smithfield
Foods,

Defendant.

Case No. 8:08-cv-504-JFB-TDT

**MOTION OF CO CLASS COUNSEL
PHILIP A. DOWNEY FOR HIS
RESPECTIVE ATTORNEYS' FEES AND
EXPENSES**

Philip A. Downey, co class counsel for the Plaintiffs, pursuant to Federal Rule of Civil Procedure 23(h) and as set forth in the parties' Settlement Agreement, respectfully seeks an approval of his attorneys' fees and an award of attorneys' fees in the amount of \$55,755, plus out-of-pocket costs in the amount of \$2068.73. For reasons more fully explained in the accompanying brief, Downey files this motion separate and apart from the motion of co Class Counsel, Berger Montague and Schneider Wallace. Support for the instant motion is set forth in the accompanying memorandum of law, which is incorporated herein.

Date: September 10, 2012

Respectfully submitted,

/s/ Philip A. Downey
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